

BEFORE THE
UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Inbound Parcel Post (at UPU Rates)

Docket No. CP2018-286

PUBLIC REPRESENTATIVE COMMENTS ON CHANGES IN PRICES
FOR INBOUND PARCEL POST (AT UPU RATES)

(August 21, 2018)

The Public Representative hereby provides comments pursuant to Order No. 4758.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of a change in rates not of general applicability for the Inbound Parcel Post (at UPU Rates) product.²

The Postal Service requests Commission approval of rates related to the UPU's e-commerce delivery option ("ECOMPRO"). ECOMPRO is included in the Inbound Parcel Post (at UPU Rates) product.

Included as Attachment 1 to the Notice is an application for non-public treatment of materials filed under seal. The Postal Service also filed as Attachments 2 the proposed rates for ECOMPRO. It also included the following: a certification pursuant to 39 C.F.R. § 3015.5(c)(2) as Attachment 3, Redacted copies of Governors' Decision Nos. 14-04 and 11-6 as Attachments 4 and 5, respectively and supporting financial documentation. Notice at 4.

COMMENTS

Pursuant to 39 U.S.C. § 3633(a), the Postal Service's competitive prices must not result in the subsidization of competitive products by market dominant products; ensure that each

¹ Order No. 4758, Notice and Order Concerning Changes in Prices for Inbound Parcel Post (at UPU Rates), August 14, 2018.

² Notice of the United States Postal Service of Filing Changes in Rates Not of General Applicability for Inbound Parcel Post (at UPU Rates), and Application for Non-Public Treatment, August 13, 2018. (Notice)

competitive product will cover its attributable costs; and, ensure that all competitive products collectively contribute an appropriate share of the institutional costs of the Postal Service.

Based upon a review of the financial data, the proposed prices for ECOMPRO should not hinder the Inbound Parcel Post (at UPU Rates) product's ability to generate sufficient revenues to cover cost. The Public Representative notes that the Postal Service accounted for uncertainty in cost estimates by including a reasonable contingency in its cost model. The Public Representative finds that the proposed rates meet the requirements of 39 U.S.C. § 3633(a).

CONCLUSION

The Public Representative recommends that the Commission approve the proposed rates for Inbound Parcel Post (at UPU Rates).

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

Katalin Clendenin
Public Representative

901 New York Ave., NW Suite 200
Washington, D.C. 20268-0001
(202) 789-6860
e-mail: katalin.clendenin@prc.gov